

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,

Plaintiff,

V.

Universal Protection Service, LP, d/b/a
Allied Universal,

Defendant.

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No. 4:23-cv-02823

Jury

PLAINTIFF TWANA AHMED'S WITNESS LIST

In accordance with the Court's form Joint Proposed Pretrial Order,¹ attached are *two copies* of Plaintiff Twana Ahmed's Witness List. It lists separately the names and addresses of witnesses who *will* be called and those who *may* be called and includes a brief statement of the subject matter and substance of their testimony. Where a witness is to appear by deposition, it cites the inclusive pages and lines to be read or played via video / audio recording. If any other witnesses will be called at the trial, their names, addresses and the subject matter of their testimony will be reported to opposing counsel as soon as they are known. This restriction will not apply to rebuttal or impeachment witnesses, the necessity of whose testimony cannot reasonably be anticipated before

¹ ECF Doc. 3-1.

trial. Please note that because attorneys' fees are to be handled post-verdict, this witness list excludes fact and expert witnesses on attorneys' fees.

Respectfully submitted,

/s/ Amanda C. Hernandez

Amanda C. Hernandez
Attorney-in-charge
Texas State Bar No. 24064411
Southern District Bar No. 1531045

AH Law, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057
T: (713) 588-4359
F: (281) 572-5370
amanda@ahfirm.com

and

Amy E. Gibson
Of Counsel
Texas State Bar No. 00793801
Southern District Bar No. 20147
amy@gwfirm.com

David L. Wiley
Of Counsel
Texas State Bar No. 24029901
Southern District Bar No. 34134
david@gwfirm.com

Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923
T: (214) 522-2121
F: (214) 522-2126

Attorneys for Twana Ahmed

CERTIFICATE OF SERVICE

The undersigned certifies that on May 2, 2025, *Plaintiff Twana Ahmed's Witness List* was filed via the Court's CM/ECF system, serving Defendant's attorneys of record as follows:

Jessica E. Chang
Martenson, Hasbrouck & Simon LLP
jchang@martensonlaw.com

Nathan A. Shine
Martenson, Hasbrouck & Simon LLP
nshine@martensonlaw.com

Jennifer L. Pope
Martenson, Hasbrouck & Simon LLP
jpope@martensonlaw.com

Attorneys for Defendant Allied Universal

/s/ Amanda C. Hernandez
Amanda C. Hernandez

Plaintiff Twana Ahmed *Will Call*:

witness	brief statement of the subject matter and substance of their testimony	deposed and type	sworn @ trial	testified @ trial
	defendant's current or former employees			
Twana Ahmed 9919 Richmond Avenue, Apt. 1122 Houston, TX 77042 (832) 896-9276	Plaintiff. How defendant treated him as an employee and his damages.	deposed fact witness		
Katherine Alyea Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060 (713) 321-0086	Defendant's Senior Regional HR Manager. Defendant's HR systems, policies, and procedures. Her assignment of Defendant's HR Representative Wayne Oliver to speak with Twana Ahmed regarding Mr. Ahmed's discrimination report.	deposed fact witness		
Catherine Barnes Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060 (832) 786-3911	Defendant's HR Coordinator. Defendant's HR systems, policies, and procedures. Receipt and process of handling Twana Ahmed's report of discrimination.	not deposed fact witness		
Alexander Bergeron Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060	Defendant's Field Supervisor. One of defendant's employees who supervised Twana Ahmed. Knowledge of Twana Ahmed's work and qualifications, defendant's policies and procedures, and events surrounding Mr. Ahmed's suspension and termination.	Not deposed fact witness		

Patrick Freeney Last known home: 17011 Colt Creek Court Humble, TX 77346 (762) 524-1023	Defendant's Client Manager. One of defendant's employees who supervised Twana Ahmed. Knowledge of how defendant treated Twana Ahmed, defendant's policies and procedures, and events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Wayne Oliver Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060 (713) 321-0086	Defendant's Regional HR Representative. Knowledge concerning investigation into Twana Ahmed's reports of discrimination after Mr. Ahmed's termination, defendant's HR systems, policies and procedures.	not deposed fact witness		
Mauro Andres Siboldi Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060 (346) 316-0299	Defendant's former Security Officer. Knowledge concerning discrimination at defendant, the training that security officers went through, and the work environment.	not deposed fact witness		
Mauricio Zepeda Last known home: 11300 Regency Green Dr., Apt. 1307 Cypress, TX 77429 (832) 580-2829	Defendant's Site Supervisor. Knowledge concerning his supervision of Twana Ahmed for defendant, defendant refusing to accommodate Mr. Ahmed's religion concerning Mr. Ahmed's beard, Mr. Ahmed's work and qualifications, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
harm defendant caused to Twana Ahmed				
Manaure Bethencourt 15906 Vista Del Mar Dr. Houston, TX 77083 (409) 354-8531	Friend of Twana Ahmed. Knowledge of how defendant harmed Twana Ahmed.	not deposed fact witness		

	defendant																																																												
Universal Protection Service, LP d/b/a Allied Universal 450 Exchange Irvine, CA 92602-5002	<p>Entity defendant.</p> <p>Knowledge of defendant’s policies and procedures, and events surrounding Mr. Ahmed’s employment, suspension, and termination. Testifying via the stenographic and/or audio and video recording of its FRCP 30(b)(6) representative.</p> <p>deposition transcript pages and lines:</p> <table><tr><td>page 5 lines 13-23</td><td>page 59 lines 1, 13-25</td><td>page 86 line 1</td></tr><tr><td>page 6 lines 15-23</td><td>page 60 lines 1-15</td><td>page 89 lines 5-25</td></tr><tr><td>page 7 lines 11-17</td><td>page 62 lines 16-25</td><td>page 90 lines 1-18</td></tr><tr><td>page 8 lines 6-9, 15-25</td><td>page 63 lines 1-14</td><td>page 93 lines 18-25</td></tr><tr><td>page 9 lines 1-13</td><td>page 64 lines 1-13, 21-25</td><td>page 94 lines 1-25</td></tr><tr><td>page 12 lines 22-25</td><td>page 65 lines 1-7</td><td>page 95 lines 1-25</td></tr><tr><td>page 13 lines 1-6</td><td>page 70 lines 18-21</td><td>page 96 lines 1-21</td></tr><tr><td>page 21 lines 4-7</td><td>page 71 lines 5-8, 12-19</td><td>page 98 lines 11-17</td></tr><tr><td>page 22 lines 21-25</td><td>page 72 lines 9-24</td><td>page 99 lines 1-4</td></tr><tr><td>page 23 lines 1-2</td><td>page 75 lines 11-12, 17-25</td><td>page 113 lines 23-25</td></tr><tr><td>page 27 lines 7-25</td><td>page 76 lines 1-25</td><td>page 114 line 1</td></tr><tr><td>page 28 lines 1-7</td><td>page 77 lines 1-5</td><td>page 116 lines 14-16, 22-23</td></tr><tr><td>page 36 lines 10-25</td><td>page 78 lines 4-6</td><td>page 117 lines 1-4, 7-12, 22-25</td></tr><tr><td>page 37 lines 1-16</td><td>page 79 lines 4-8</td><td>page 118 lines 1-5</td></tr><tr><td>page 45 lines 8-11, 22-25</td><td>page 80 line 25</td><td>page 119 lines 6-8</td></tr><tr><td>page 55 lines 17-25</td><td>page 81 lines 1-5, 22-25</td><td>page 120 lines 16-25</td></tr><tr><td>page 56 lines 1-5, 12-25</td><td>page 82 lines 1-25</td><td>page 121 lines 1-14</td></tr><tr><td>page 57 lines 1-6</td><td>page 83 lines 1-10</td><td>page 123 lines 17-20</td></tr><tr><td>page 58 lines 3-7, 20-25</td><td>page 85 lines 9-12, 14-25</td><td>page 124 lines 2-6</td></tr></table> <p>these excerpts, highlighted, are attached to this witness list.</p>	page 5 lines 13-23	page 59 lines 1, 13-25	page 86 line 1	page 6 lines 15-23	page 60 lines 1-15	page 89 lines 5-25	page 7 lines 11-17	page 62 lines 16-25	page 90 lines 1-18	page 8 lines 6-9, 15-25	page 63 lines 1-14	page 93 lines 18-25	page 9 lines 1-13	page 64 lines 1-13, 21-25	page 94 lines 1-25	page 12 lines 22-25	page 65 lines 1-7	page 95 lines 1-25	page 13 lines 1-6	page 70 lines 18-21	page 96 lines 1-21	page 21 lines 4-7	page 71 lines 5-8, 12-19	page 98 lines 11-17	page 22 lines 21-25	page 72 lines 9-24	page 99 lines 1-4	page 23 lines 1-2	page 75 lines 11-12, 17-25	page 113 lines 23-25	page 27 lines 7-25	page 76 lines 1-25	page 114 line 1	page 28 lines 1-7	page 77 lines 1-5	page 116 lines 14-16, 22-23	page 36 lines 10-25	page 78 lines 4-6	page 117 lines 1-4, 7-12, 22-25	page 37 lines 1-16	page 79 lines 4-8	page 118 lines 1-5	page 45 lines 8-11, 22-25	page 80 line 25	page 119 lines 6-8	page 55 lines 17-25	page 81 lines 1-5, 22-25	page 120 lines 16-25	page 56 lines 1-5, 12-25	page 82 lines 1-25	page 121 lines 1-14	page 57 lines 1-6	page 83 lines 1-10	page 123 lines 17-20	page 58 lines 3-7, 20-25	page 85 lines 9-12, 14-25	page 124 lines 2-6	deposed fact witness		
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Plaintiff Twana Ahmed *May Call*:

witness	brief statement of the subject matter and substance of their testimony	deposed and type	sworn @ trial	testified @ trial
	defendant's current or former employees			
Krystal Balanta Last known work: Allied Universal 1717 Turning Basin Dr., Suite 235 Houston, TX 77029 (281) 908-0665	Defendant's Recruiter. Knowledge of defendant making Twana Ahmed ineligible for re-hire, and events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Matthew Gaussen Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060	Defendant's Director of Operations. Knowledge concerning defendant's policies and procedures, the investigation into Twana Ahmed's reports of discrimination and retaliation, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Martin Hernandez Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060	Defendant's Trainer. Knowledge concerning how defendant treated Twana Ahmed in onboarding / training as an employee of defendant, and the company policies and procedures applied to Mr. Ahmed.	not deposed fact witness		
Nathan Hernandez Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (281) 219-7191	Defendant's Field Supervisor. Supervised Twana Ahmed for Defendant. Knowledge concerning Mr. Ahmed's work and qualifications, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		

Chelsea Joseph 3802 Simsbrook Drive Houston, TX 77045 (832) 517-2371	Defendant's former employee. Knowledge concerning discrimination and retaliation at defendant, the training that security officers went through, and the work environment.	not deposed fact witness		
Bill King Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (346) 802-8305	Defendant's Regional Vice President. Knowledge concerning defendant's training, policies and procedures, generally and as applied to Twana Ahmed, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Don Massey Last known work: Allied Universal 1776 Woodstead Court, Suite 224 The Woodlands, TX 77380 (281) 725-8623	Defendant's former General Manager. Knowledge concerning Twana Ahmed's training with defendant, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Monroe McClain Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (281) 881-4473	Defendant's Regional Trainer. Knowledge concerning training of Twana Ahmed, Mr. Ahmed's work and qualifications, and defendant's policies and procedures.	not deposed fact witness		
Kareem McKinnon Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (832) 687-9248	Defendant's former Regional Vice President and current Senior Vice President. Knowledge concerning defendant's policies and procedures, the investigation into Twana Ahmed's reports of discrimination and retaliation, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		

Patrick Parham Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060	Defendant's Field Supervisor. Knowledge of his supervision of Twana Ahmed, Mr. Ahmed's work and qualifications, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Raymond Rodriguez Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060 (832) 441-2052 Last known home address [see ECF 34-1, p. 151]: 16402 Ashlyn Timbers Lane Magnolia, TX 77355 (832) 513-0699	Defendant's former Security Officer and current Field Supervisor. Knowledge concerning the training that security officers went through with defendant, defendant's use of force policies, and the working environment.	not deposed fact witness		
Dwayne Trahan Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060	Defendant's former Client Manager. Knowledge concerning the training that defendant's security officers went through, use of force policies, defendant's process of hiring Twana Ahmed, and the working environment.	not deposed fact witness		

	defendant's client			
Meredith Rodriques Last known work: H-E-B 5895 San Felipe St. Houston, TX 77057 (713) 278-8450	H-E-B Manager in Charge. Knowledge of H-E-B's security agreements with defendant, of Twana Ahmed's work, and report of man attempting theft / request for Twana Ahmed to stop the attempted theft at H-E-B store Ms. Rodriques was managing.	not deposed fact witness		
	witness to security officer mistreatment			
Kamesha Sterling Last known work: 5603 Fair Forest Dr. Houston, TX 77088 (832) 526-0047	Patron of a grocery store at which defendant contracted to provide security. Knowledge of defendant's security officer mistreatment of patron at store, video she took of a defendant security officer at a Kroger on more than one occasion.	not deposed fact witness		

Plaintiff Twana Ahmed may also call any witness listed on Defendant's witness list.

Plaintiff Twana Ahmed *Will Call*:

witness	brief statement of the subject matter and substance of their testimony	deposed and type	sworn @ trial	testified @ trial
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Twana Ahmed 9919 Richmond Avenue, Apt. 1122 Houston, TX 77042 (832) 896-9276	Plaintiff. How defendant treated him as an employee and his damages.	deposed fact witness		
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witness	brief statement of the subject matter and substance of their testimony	deposed and type	sworn @ trial	testified @ trial
	defendant's current or former employees			
Krystal Balanta Last known work: Allied Universal 1717 Turning Basin Dr., Suite 235 Houston, TX 77029 (281) 908-0665	Defendant's Recruiter. Knowledge of defendant making Twana Ahmed ineligible for re-hire, and events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Matthew Gaussen Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060	Defendant's Director of Operations. Knowledge concerning defendant's policies and procedures, the investigation into Twana Ahmed's reports of discrimination and retaliation, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Martin Hernandez Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060	Defendant's Trainer. Knowledge concerning how defendant treated Twana Ahmed in onboarding / training as an employee of defendant, and the company policies and procedures applied to Mr. Ahmed.	not deposed fact witness		
Nathan Hernandez Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (281) 219-7191	Defendant's Field Supervisor. Supervised Twana Ahmed for Defendant. Knowledge concerning Mr. Ahmed's work and qualifications, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		

Chelsea Joseph 3802 Simsbrook Drive Houston, TX 77045 (832) 517-2371	Defendant's former employee. Knowledge concerning discrimination and retaliation at defendant, the training that security officers went through, and the work environment.	not deposed fact witness		
Bill King Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (346) 802-8305	Defendant's Regional Vice President. Knowledge concerning defendant's training, policies and procedures, generally and as applied to Twana Ahmed, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Don Massey Last known work: Allied Universal 1776 Woodstead Court, Suite 224 The Woodlands, TX 77380 (281) 725-8623	Defendant's former General Manager. Knowledge concerning Twana Ahmed's training with defendant, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Monroe McClain Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (281) 881-4473	Defendant's Regional Trainer. Knowledge concerning training of Twana Ahmed, Mr. Ahmed's work and qualifications, and defendant's policies and procedures.	not deposed fact witness		
Kareem McKinnon Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060 (832) 687-9248	Defendant's former Regional Vice President and current Senior Vice President. Knowledge concerning defendant's policies and procedures, the investigation into Twana Ahmed's reports of discrimination and retaliation, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		

Patrick Parham Last known work: Allied Universal 11811 North Freeway, Suite 810 Houston, TX 77060	Defendant's Field Supervisor. Knowledge of his supervision of Twana Ahmed, Mr. Ahmed's work and qualifications, defendant's policies and procedures, and the events surrounding Mr. Ahmed's suspension and termination.	not deposed fact witness		
Raymond Rodriguez Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060 (832) 441-2052 Last known home address [see ECF 34-1, p. 151]: 16402 Ashlyn Timbers Lane Magnolia, TX 77355 (832) 513-0699	Defendant's former Security Officer and current Field Supervisor. Knowledge concerning the training that security officers went through with defendant, defendant's use of force policies, and the working environment.	not deposed fact witness		
Dwayne Trahan Last known work: Allied Universal 11811 N. Freeway, Suite 810 Houston, TX 77060	Defendant's former Client Manager. Knowledge concerning the training that defendant's security officers went through, use of force policies, defendant's process of hiring Twana Ahmed, and the working environment.	not deposed fact witness		

	defendant's client			
Meredith Rodriques Last known work: H-E-B 5895 San Felipe St. Houston, TX 77057 (713) 278-8450	H-E-B Manager in Charge. Knowledge of H-E-B's security agreements with defendant, of Twana Ahmed's work, and report of man attempting theft / request for Twana Ahmed to stop the attempted theft at H-E-B store Ms. Rodrigues was managing.	not deposed fact witness		
	witness to security officer mistreatment			
Kamesha Sterling Last known work: 5603 Fair Forest Dr. Houston, TX 77088 (832) 526-0047	Patron of a grocery store at which defendant contracted to provide security. Knowledge of defendant's security officer mistreatment of patron at store, video she took of a defendant security officer at a Kroger on more than one occasion.	not deposed fact witness		

Plaintiff Twana Ahmed may also call any witness listed on Defendant's witness list.